

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PLUMBERS, PIPEFITTERS & MES LOCAL
UNION NO. 392 PENSION FUND, On Behalf of
Itself And All Others Similarly Situated,

Plaintiffs,

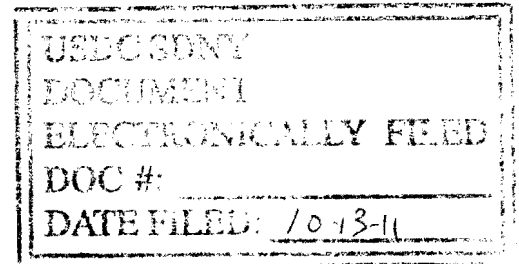
v.

FAIRFAX FINANCIAL HOLDINGS LIMITED, et
al.,

Defendants.

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X

No. 11 CV 5097 (JFK)



STIPULATION AND [PROPOSED] ORDER

WHEREAS on July 25, 2011, plaintiff Plumbers, Pipefitters & MES Local Union No. 392 Pension Fund filed the above-captioned lawsuit against defendants Fairfax Financial Holdings Limited, Odyssey Re Holdings Corp., V. Prem Watsa, Trevor J. Ambridge, Greg Taylor, M. Jane Williamson, Anthony F. Griffiths, Robbert Hartog, Bradley P. Martin, Brandon Sweitzer, and PricewaterhouseCoopers LLP, Chartered Accountants, Toronto, Ontario, Canada ("Defendants") alleging violations of the federal securities laws (the "Complaint");

WHEREAS on October 12, 2011, the Court issued a Memorandum Opinion & Order granting the unopposed motion of Plumbers, Pipefitters & MES Local Union No. 392 Pension Fund for appointment as Lead Plaintiff; and

WHEREAS Lead Plaintiff will stand on the Complaint in lieu of filing an amended complaint.

NOW, THEREFORE, the parties hereby stipulate to the following, subject to the approval of the Court:

1. Defendants hereby accept service of the Complaint.

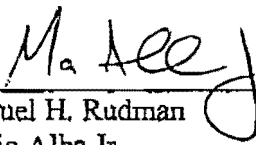
2. Defendants will file and serve their motions to dismiss the Complaint on or before December 9, 2011.

3. Lead Plaintiff shall have sixty (60) days from service of Defendants' motions to dismiss to file and serve its opposition.

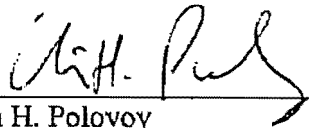
~~4. Defendants shall have forty five (45) days from service of Lead Plaintiff's opposition to file and serve their replies.~~ In accordance with this Court's Individual Practice Section 2E, a full set of motion papers should be filed on April 1, 2012.

5. Nothing in this Stipulation shall be deemed or construed to constitute a waiver of any defenses or arguments available to Defendants, including the defense of lack of personal jurisdiction.

Dated: New York, New York
October 12, 2011




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SO ORDERED this 13 day of October, 2011

John F. Keenan

JOHN F. KEENAN
United States District Judge